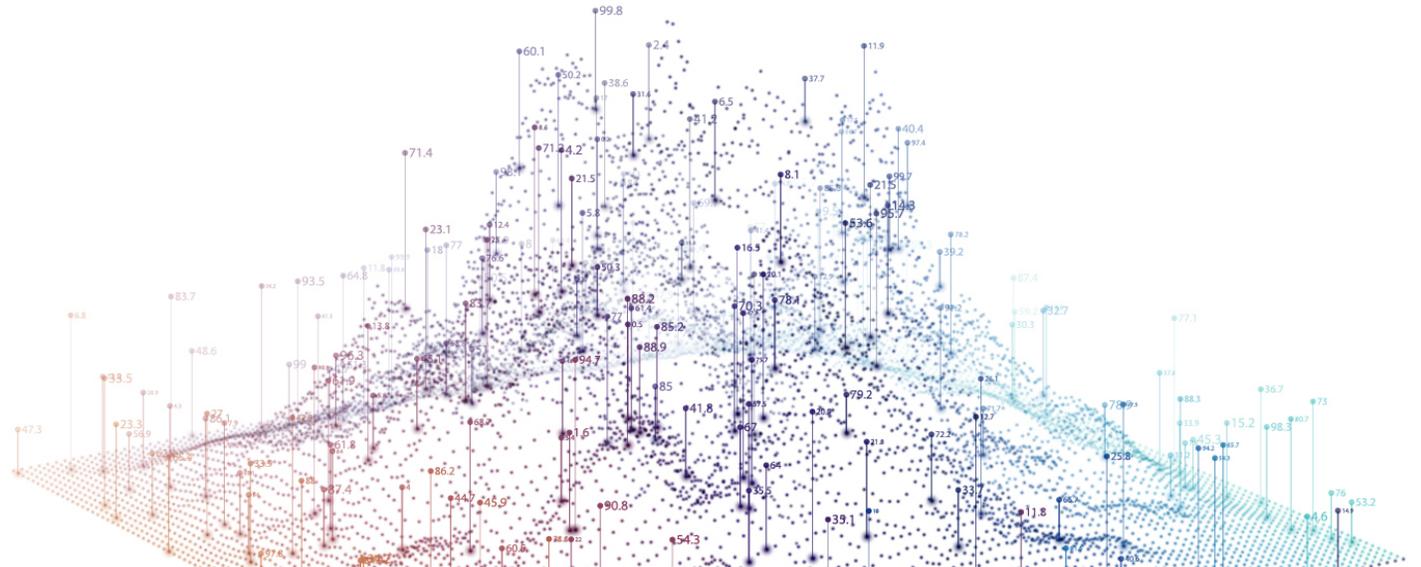


Privacy policy

AlaaS Sky Engine AI
Version 01



Privacy policy

GENERAL

1.1 Sky Engine (Ltd.), reg.no. 11333531, and our international offices in the relevant countries (collectively "Sky Engine") respects and cares about your personal integrity. By way of this privacy policy ("**Privacy Policy**"), we want to inform you about how we ensure that your personal data is processed in the right way and in accordance with applicable law.

1.2 To be able to conduct our business, including to provide and market our products and services, we process personal data about you. This Privacy Policy applies to you who is

- a representative of a company using Sky Engine's products or services ("**Customer**"),
- a representative of a company which Sky Engine uses/collaborates with to conduct its business, e.g. representatives of distributors and suppliers ("**Sub-Contractor**") or representatives of regulatory authorities ("**Authority**"), - a representative of a company that may be a potential Customer of Sky Engine ("**Prospect**"), or
- another stakeholder with an interest to receive information about Sky Engine's business.

DATA CONTROLLER AND DATA PROTECTION OFFICER

2.1 Sky Engine is the data controller for the processing of your personal data and is responsible for ensuring that the processing is made in compliance with applicable law. You find our contact details at the last page of this Privacy Policy.

2.2 Sky Engine has appointed a Data Protection Officer to monitor that we process your personal data in a safe and compliant manner. The Data Protection Officer can be contacted at dataprotection@skyengine.ai.

OUR PROCESSING OF YOUR PERSONAL DATA

3.1 At Sky Engine, we process your personal data to provide you with the products and services we offer in the best way possible. This includes that we use your personal data to:

- Administer and carry out our contractual obligations, or otherwise document Sky Engine's interactions in regard to the company or organization you represent,
- Fulfill our regulatory obligations,
- Conduct marketing activities, including customer adapted direct marketing,
- Administer our events,
- Gather experience and preferences from users of our products and services to continuously improve the quality of our business, and
- Conduct communication activities, e.g. correspond with you through email and provide requested information connected to our business (other than marketing material).

In the tables below, you are, based on what category of data subject you belong to, provided with more information about e.g. why we process your personal data, which personal data we may keep to achieve the purposes of the processing, for how long we keep your personal data and your connected rights.

Privacy policy

<p>Category of data subject(s): Customer and Sub-contractor. Purpose: Administer and carry out our obligations, or otherwise document Sky Engine’s interactions, regarding the company or organization that you represent and safeguard our legal interests in case of a dispute.</p>		
<p>Categories of Personal data that we may process: Contact information such as name, title, address, email address and workplace. Orders and payment information such as order history and payment information. Login information such as email address, password and IP-address (if interacting on Sky Engine systems and platforms).</p>		
<p>What we do: We collect, use and store your personal data to be able to administer and carry out our obligations, or otherwise document Sky Engine’s interactions, regarding the company or organization you represent. In case of a dispute regarding e.g. payment, we are entitled to process your personal data to establish, exercise or defend the legal claim.</p>	<p>Legal basis: Legitimate interest, as we assess that our interest of fulfilling our contractual obligations towards the company or organization you represent, keep documentation on our interactions with the company/organization, and to safeguard our legal interests in case of dispute, overrides your interest of protection of your privacy regarding information connected with your professional activities.</p>	<p>Retention period: Your personal data is kept as long as necessary for aforementioned purposes, i.e. during the entire relevant contract period and at least 12 months thereafter. We may keep your personal data for a longer time period if necessary to handle matters with the company/organization you represent or establish, exercise or defend a legal claim in case of a dispute regarding the performance of the contract.</p>
<p>Your rights: <i>Right to access:</i> You have the right to obtain information on what personal data we have about you and how we process this data, as well as receive a copy of this information. <i>Right to rectification and erasure:</i> You have the right to have inaccurate personal data rectified and completed. In some cases, you may also have the right to have your personal data erased, for example if it is no longer necessary for the purpose for which it was collected. <i>Right to object and right of restriction:</i> You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate basis for the processing that outweighs your interest, fundamental rights or freedoms. You also have the right to demand that we stop using your personal data or erase it in cases where we process your personal data in an unauthorized manner. <i>Right to data portability:</i> In some cases, you have the right to obtain the personal data you have provided. The data will be presented in a structured and machine-readable format, and you also have the right to transmit the data to another controller where technically feasible.</p>		

Privacy policy

<p>Category of data subjects): Customer, Sub-contractor and Authority. Purpose: Fulfil our regulatory obligations connected to the performance of our business, e.g. the providing and use of our products and services.</p>		
<p>Categories of personal data that we may process: Contact information such as name, title, email and workplace. Training information such as training history on the use of our products.</p>		
<p>What we do: Depending on what company or authority you represent, we collect, use and store your personal data to be able to fulfil our regulatory obligations, e.g. as a medical device manufacturer and distributor, an employer, a limited company etc.. For example, in accordance with medical device regulations, Sky Engine may be required to document which representatives of our Customers that have participated in trainings on the use of our products and retain contact details in case we need to send safety notices to the company or organization you represent.</p>	<p>Legal basis: Legal obligations applicable to Sky Engine as a medical device provider, employer, limited company or otherwise as a business operator.</p>	<p>Retention period: Your personal data is kept for the time necessary to administrate and document Sky Engine’s compliance with the requirements laid down in applicable regulations.</p>
<p>Your rights: <i>Right to access:</i> You have the right to obtain information on what personal data we have about you and how we process this data, as well as receive a copy of this information. <i>Right to rectification and erasure:</i> You have the right to have inaccurate personal data rectified and completed. In some cases, you may also have the right to have your personal data erased, for example if it is no longer necessary for the purpose for which it was collected. <i>Right of restriction:</i> You have the right to demand that we stop using your personal data or erase it in cases where we process your personal data in an unauthorized manner. <i>Right to data portability:</i> In some cases, you have the right to obtain the personal data you have provided. The data will be presented in a structured and machine-readable format, and you also have the right to transmit the data to another controller where technically feasible.</p>		

Privacy policy

<p>Category of data subject(s): Customers, Prospect or other stakeholder. Purpose: Marketing, including direct marketing</p>		
<p>Categories of personal data that we may process: Contact information such as name, telephone number, email address and workplace. Information about areas of interest within cancer treatment. Login information such as email address, password and IP-address (if interacting on Sky Engine systems and platforms). Information about earlier contacts such as information where and when you met a representative from us. Browsing habits and web browsing history when visiting Sky Engine’s web pages. Photos/videos of you, from our events or public events.</p>		
<p>What we do: We collect, use and store your personal data within the scope of our marketing activities, e.g. to send out marketing material regarding the business of the company, updates regarding our software development information/invitations to upcoming events. Furthermore, we process your personal data in terms of information regarding how you use our webpage and your attitude towards our products and our business to analyse how we shall best approach you as a Prospect or other stakeholder.</p>	<p>Legal basis: Legitimate interest, as we assess that our interest of marketing our services and products overrides your interest of protection of your privacy regarding information connected with your professional activities or other areas of interest.</p>	<p>Retention period: <i>If you are a representative of a Customer of ours:</i> Your personal data is kept during the entire contract period and at least 12 months thereafter. This is preconditioned upon you not having opposed direct marketing. <i>If you are a representative of a Prospect or another stakeholder:</i> As long as you are actively interacting with us, or for 12 months from our latest interaction. This is preconditioned upon you not having opposed direct marketing. If your workplace becomes a Customer of ours, what is stated below the heading “If you are a representative of a Customer of ours” applies.</p>
<p>We need your consent in order to use photos of you for marketing purposes.</p>	<p>Consent.</p>	<p>As long the photos are relevant to use in our marketing activities or until you withdraw your consent.</p>
<p>Your rights: <i>Right to withdraw consent:</i> Where we process your personal data based on your consent, you have the right to withdraw your consent at any time. If you withdraw your consent, we will discontinue the processing for which you have given your consent and erase the personal data processed solely on the basis of the consent. Your withdrawal will however only affect Sky Engine’s future processing of the personal data, not activities already conducted. <i>Right to access:</i> You have the right to obtain information on what personal data we have about you and how we process this data, as well as receive a copy of this information. <i>Right to rectification and erasure:</i> You have the right to have inaccurate personal data rectified and completed. In some cases, you may also have the right to have your personal data erased, for example if it is no longer necessary for the purpose for which it was collected. <i>Right to data portability:</i> In some cases, you have the right to obtain the personal data you have provided. The data will be presented in a structured and machine-readable format, and you also have the right to transmit the data to another controller where technically feasible. <i>Right to object and of restriction:</i> You always have right to demand that we stop using your personal data for marketing purposes. You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. You also have the right to demand that we stop using your personal data or erase it in cases where we process your personal data in an unauthorized manner.</p>		

Privacy policy

<p>Category of data subject(s): Customer, Prospect or other stakeholder. Purpose: Event administration</p>		
<p>Personal data: Contact information such as name, telephone number, email address, title and workplace. Information about areas of interest within advancements in the artificial intelligence, computer vision, and imaging. Sensitive personal data such as information about allergies.</p>		
<p>What we do: We process your personal data within the scope of our event administration in order to be able to perform necessary administration in connection to our events. We need your consent in order to use information regarding your allergies (if any) to be able to perform necessary administration and safe performance of the event.</p>	<p>Legal basis: Legitimate interest, as we assess that our interest of performing necessary administration in connection to our events overrides your interest of protection of your privacy in regard to information needed to conduct the event in a safe and effective manner. Consent regarding information on allergies.</p>	<p>Retention period: Information specific to your participation in the event (e.g. information about allergies) is only kept until the event has taken place or if you withdraw your consent (where applicable).</p>
<p>Your rights: <i>Right to access:</i> You have the right to obtain information on what personal data we have about you and how we process this data, as well as receive a copy of this information. <i>Right to rectification and erasure:</i> You have the right to have inaccurate personal data rectified and completed. In some cases, you may also have the right to have your personal data erased, for example if it is no longer necessary for the purpose for which it was collected. <i>Right to data portability:</i> In some cases, you have the right to obtain the personal data you have provided. The data will be presented in a structured and machine-readable format, and you also have the right to transmit the data to another controller where technically feasible. <i>Right to object and right of restriction:</i> You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate basis for the processing that outweighs your interest, fundamental rights or freedoms. You also have the right to demand that we stop using your personal data or erase it in cases where we process your personal data in an unauthorized manner.</p>		

Privacy policy

<p>Category of data subject(s): Customer, Sub-contractor, Authority, Prospect or other stakeholder. Purpose: Correspondence through e-mail</p>		
<p>Personal data: Contact information such as name, telephone number, address, email address, workplace and job title.</p>		
<p>What we do: We collect, use and store your personal data to respond to and handle your message.</p>	<p>Legal basis: Legitimate interest, as we assess that our interest of communicating with you and answer the incoming correspondence we receive overrides your interest of protection of your privacy regarding information that you provide when corresponding with us.</p>	<p>Retention period: Your personal data will be processed as long as it is motivated by the context, to respond to and handle your email.</p>
<p>Your rights: <i>Right to access:</i> You have the right to obtain information on what personal data we have about you and how we process this data, as well as receive a copy of this information. <i>Right to rectification and erasure:</i> You have the right to have inaccurate personal data rectified and completed. In some cases, you may also have the right to have your personal data erased, for example if it is no longer necessary for the purpose for which it was collected. <i>Right to data portability:</i> In some cases, you have the right to obtain the personal data you have provided. The data will be presented in a structured and machine-readable format, and you also have the right to transmit the data to another controller where technically feasible. <i>Right to object and right of restriction:</i> You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate basis for the processing that outweighs your interest, fundamental rights or freedoms. You also have the right to demand that we stop using your personal data or erase it in cases where we process your personal data in an unauthorized manner.</p>		

Privacy policy

<p>Category of data subject(s): Customers Purpose: Gather experience and preferences from users of our products and services to continuously improve the quality of our business.</p>		
<p>Personal data: Contact information such as name, email address, title and workplace. User's ways of working, experience and preferences regarding Sky Engine's products and services</p>		
<p>What we do: We collect (mainly through customer surveys), use and store your personal data to understand what you, as a user of our products and/or services, think about the function of these and, based on the input collected, evaluate and perform necessary improvements to continuously improve the quality of our business. If you agree we may also anonymize and use the answers you provide regarding experiences and preferences related to our products and services in informational and marketing material.</p>	<p>Legal basis: Legitimate interest, as we assess that our interest of using user experiences and preferences to evaluate and ensure that we conduct our business with high quality, cost- effectiveness and competitiveness that provides customer and patient benefit overrides your interest of protection of your privacy in regard to information connected to your professional activities that you voluntary provide us with.</p>	<p>Retention period: Information that specifically relates to your experience and preferences about our products and services (e.g. answers in customer surveys) will be saved for 5 years.</p>
<p>Your rights: <i>Right to access:</i> You have the right to obtain information on what personal data we have about you and how we process this data, as well as receive a copy of this information. <i>Right to rectification and erasure:</i> You have the right to have inaccurate personal data rectified and completed. In some cases, you may also have the right to have your personal data erased, for example if it is no longer necessary for the purpose for which it was collected. <i>Right to data portability:</i> In some cases, you have the right to obtain the personal data you have provided. The data will be presented in a structured and machine-readable format, and you also have the right to transmit the data to another controller where technically feasible. <i>Right to object and right of restriction:</i> You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate basis for the processing that outweighs your interest, fundamental rights or freedoms. You also have the right to demand that we stop using your personal data or erase it in cases where we process your personal data in an unauthorized manner.</p>		

Privacy policy

Category of data subjects: All categories.

Purpose: Administration in connection with acquisition or restructuring of Sky Engine, etc.

Personal data:

Contact information such as name, telephone number, email address and workplace.

Information about areas of interest in cancer radiation treatment.

Login information such as email address, password and IP-address.

Browsing habits and web browsing history such as which of our web pages you have visited and for your long. Information about earlier contacts such as information where and when you did a meet a representative from us. Photos of you.

What we do:

If Sky Engine is to be restructured, e.g. be split into several parts, or if a third party wishes to acquire Sky Engine or our customer database, Sky Engine will share your personal data to the acquiring company. That company will in that case continue to process your personal data for the same purposes as the ones stated in this Privacy Policy, unless you receive different information in connection with the acquisition.

Legal basis:

Legitimate interest, as we assess that our interest of facilitating a company acquisition or restructuring overrides your interest of protection of your privacy.

Retention period:

If Sky Engine ceases to exist, e.g. by way of a fusion, liquidation or bankruptcy, or if Sky Engine Laboratories' customer database will be transferred to an acquiring company we will delete your personal data as long as we are not required to keep in order to comply with legal obligations. If Sky Engine is acquired by a company or split into several parts in connection with a restructuring we will continue to store and process your personal data in accordance with the terms and conditions of this Privacy Policy, unless you receive different information in connection with the acquisition.

Your rights:

Right to access: You have the right to obtain information on what personal data we have about you and how we process this data, as well as receive a copy of this information.

Right to rectification and erasure: You have the right to have inaccurate personal data rectified and completed. In some cases, you may also have the right to have your personal data erased, for example if it is no longer necessary for the purpose for which it was collected.

Right to data portability: In some cases, you have the right to obtain the personal data you have provided. The data will be presented in a structured and machine-readable format, and you also have the right to transmit the data to another controller where technically feasible.

Right to object and right of restriction: You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate basis for the processing that outweighs your interest, fundamental rights or freedoms. You also have the right to demand that we stop using your personal data or erase it in cases where we process your personal data in an unauthorized manner.

Privacy policy

Contact details

If you have any questions regarding this Privacy Policy, our processing of your personal data, or if you want to exercise your rights or lodge a complaint with us, you may contact us in any of the following ways:

Sky Engine (Limited), reg.no. 11333531

Postal address: 2nd floor, 45 King William Street, EC4R 9AN London, UNITED KINGDOM.

Email: dataprotection@skyengine.ai

Telephone: 44 (0)749 05 982 49

Webpage: <https://www.skyengine.ai/>

Changes and updates

We reserve the right to change this Privacy Policy from time to time in order to make any necessary clarifications or updates to comply with legislation applicable on our processing of personal data. The date of any changes will be posted on this page. If we make any material changes in our privacy practices, the change will also be published on our Website under “About” and “Privacy Statement”. If you have any questions regarding the changes made, please contact dataprotection@skyengine.ai.

The latest update of this Privacy Policy was conducted in January 2020.